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**ATTORNEYS FOR OPERATORS OF
NHENTAI.NET**

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

In re DMCA Subpoena to Cloudflare, Inc.	Case No. 2:24-mc-00084-UA
	DECLARATION OF JOHN T. WILSON ISO OPERATORS OF NHENTAI.NET'S MOTION TO INTERVENE, TO QUASH §512(H) SUBPOENA, FOR PROTECTIVE ORDER, AND TO STAY DEADLINE

I, John T. Wilson, hereby state and declare as follows:

1.   I provide this declaration in support of operators of the nhentai.net

website's ("Nhentai.net") Motion to Intervene, to Quash §512(h) Subpoena, for

Protective Order, and to Stay Deadline.

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2.   I am currently the managing partner of the law firm of Wilson Whitaker Rynell in Dallas, Texas and am attorney for Nhentai.net in the above-referenced matter. I have personal knowledge of the facts stated herein.

3.   Cloudflare is aware of Nhentai.net's intention to intervene to prevent release of the information and has stated that it will respond to the subpoena unless Nhentai.net intervenes no later than one week from the date of the notice.

4.   Attached as **Exhibit A** is a true and correct copy of screenshot of Nhentai.net's DNS management page on Cloudflare.

5.   According to its website, Cloudflare describes its DNS services as "the phonebook of the Internet" - <u>What is a DNS server? | Cloudflare</u> (last visited July 18, 2024).

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 19, 2024 in Dallas, Texas.

John T. Wilson

"EXHIBIT A"

CLOUDFLARE

Add site   Support ▾   English (US) ▾   👤 ▾

← nhentai.net

📄 Overview
🕐 Analytics ▾
🔲 DNS
✉️ Email Beta
◎ Spectrum
🔒 SSL/TLS ▾
🛡️ Firewall ▾
🔑 Access
⚡ Speed ▾
🗄️ Caching ▾
◇ Workers
⌁ Rules ▾
📍 Network
⧉ Traffic ▾

« Collapse sidebar

DNS

A few more steps are required to complete your setup.	Show

DNS management for **nhentai.net**

🔍 Search DNS Records | 📋 Advanced | ⊕ Add record |

Type	Name	Content	Proxy status ▾	TTL	Actions
A	nhentai.net	▓▓▓▓	☁ Proxied	Auto	Edit ▸
A	static	▓▓▓▓	☁ Proxied	Auto	Edit ▸
A	www	▓▓▓▓	☁ Proxied	Auto	Edit ▸
MX	nhentai.net	▓▓▓▓	10 DNS only	Auto	Edit ▸
MX	nhentai.net	▓▓▓▓	1 DNS only	Auto	Edit ▸
A	blog	▓▓▓▓	☁ DNS only	Auto	Edit ▸
TXT	pic._domainkey	▓▓▓▓	DNS only	Auto	Edit ▸
TXT	nhentai.net	▓▓▓▓	DNS only	Auto	Edit ▸
CNAME	3b3fd438c35f25b254adde…	▓▓▓▓	☁ DNS only	Auto	Edit ▸
TXT	mail._domainkey	▓▓▓▓	DNS only	Auto	Edit ▸
CNAME	mail	▓▓▓▓	DNS only	Auto	Edit ▸
CNAME	s1._domainkey	▓▓▓▓	DNS only	Auto	Edit ▸
CNAME	s2._domainkey	▓▓▓▓	DNS only	Auto	Edit ▸
CNAME	_f99e3cb644b8959a40d17…	▓▓▓▓	☁ DNS only	Auto	Edit ▸
A	i7	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	t2	▓▓▓▓	☁ DNS only	Auto	Edit ▸
A	t7	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	i5	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	t5	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	webseed	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	i	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	t	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	webseed	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	t	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	i	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	i2	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	t	▓▓▓▓	☁ DNS only	2 min	Edit ▸
A	i	▓▓▓▓	☁ DNS only	2 min	Edit ▸
MX	nhentai.net	▓▓▓▓	5 DNS only	Auto	Edit ▸
A	webseed	▓▓▓▓	☁ DNS only	2 min	Edit ▸
MX	nhentai.net	▓▓▓▓	5 DNS only	Auto	Edit ▸
MX	nhentai.net	▓▓▓▓	10 DNS only	Auto	Edit ▸

Cloudflare Nameservers

To use Cloudflare, ensure your authoritative DNS servers, or nameservers have been changed. These are your assigned Cloudflare nameservers.

Type	Value
NS	carl.ns.cloudflare.com
NS	mary.ns.cloudflare.com

Custom Nameservers

Custom nameservers allow you to create your own, unique nameservers in place of your assigned Cloudflare nameservers. To switch to using custom nameservers, first create them here, then add them as glue records at your registrar.

Upgrade to Business

Help ▸

DNSSEC

DNSSEC protects against forged DNS answers. DNSSEC protected zones are cryptographically signed to ensure the DNS records received are identical to the DNS records published by the domain owner.

Enable DNSSEC

Help ▸

CNAME Flattening

Cloudflare will follow a CNAME to where it points and return that IP address instead of the CNAME record. By default, Cloudflare will only flatten the CNAME at the root of your domain, which is nhentai.net.

Flatten CNAME at root ▾

Help ▸

Email Security New

Protect your domain from email spoofing and phishing by creating the required DNS records.

Configure

Help ▸

Contact
Contact support
Contact sales
Call sales: +1 (888) 993 5273
🐦 📘 in

What we do
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Overview
Features
Network
Apps

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Case studies
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